

JUDGE BUCHWALD

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-v.-

OLEKSANDR DOROZHKO

Defendant,

Case No. _____

COPY

07 CIV 9606

**EMERGENCY APPLICATION FOR A TEMPORARY RESTRAINING ORDER,
AN ORDER FREEZING ASSETS AND GRANTING OTHER RELIEF, AND AN
ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD
NOT ISSUE**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff Securities and Exchange Commission (the "SEC") hereby moves this Court for an Order:

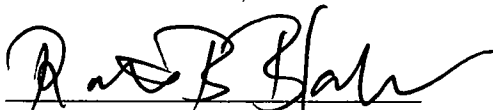
- (1) freezing all assets in account number U412281 at Interactive Brokers LLC in the name of Defendant Dorozhko;
- (2) temporarily restraining Defendant from violating Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act"), 15 U.S.C. § 78j(b), and Rule 10b-5 thereunder, 17 C.F.R. § 240.10b-5;
- (3) prohibiting the destruction, alteration, or concealment of documents;
- (4) authorizing alternative means for service of process;
- (5) directing Defendant Oleksandr Dorozhko ("Dorozhko" or "Defendant") to show cause why an order should not be entered preliminarily enjoining

Defendant from violating Section 10(b) of the Exchange Act, 15 U.S.C. § 78j(b), and Rule 10b-5 thereunder, 17 C.F.R. § 240.10b-5; and

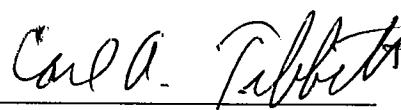
(6) providing for expedited discovery in preparation for a hearing on this Order to Show Cause.

The grounds supporting this application are fully set forth in (1) the Complaint filed by the SEC on October 29, 2007; (2) the Plaintiff Securities And Exchange Commission's Memorandum Of Law In Support Of Emergency Application For A Temporary Restraining Order, An Order Freezing Assets And Granting Other Relief, And An Order To Show Cause Why A Preliminary Injunction Should Not Issue; and (3) the Declaration of Paul A. Gumagay, executed on October 29, 2007, and the exhibits attached thereto. A proposed form of Order is filed herewith.

Dated: 10/29/7


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Respectfully submitted,


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